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CLEARINGHOUSE RULE 99-001

Comments

[NOTE: All citations to “Manual” in the comments below are to the Administrative Rules Procedures Manual, prepared by the Revisor of Statutes Bureau and the Legislative Council Staff, dated September 1998.]

2. Form, Style and Placement in Administrative Code

a. While the changes in the rule might be characterized as “minor,” as indicated in the analysis, the rationale of a number of the changes is not necessarily evident. Arguably, specific explanation should be given to the treatment by the rule of the following provisions: ss. Med 8.05 (2) (b) 10. and 11.; 8.06 (4); 8.07 (2) (e) and (i); and 8.08 (1) and (2) (d) and (e) 2. and 3.

b. In s. Med 8.04, to what does “its successor agency” refer? The use of “successor agency” in that section and in s. Med 8.04 (intro.) and (1) (cm) should be reviewed. It is noted, for example, that s. 448.05 (5) (a) 1., Stats., refers to the National Commission on Certification of Physician Assistants but not its “successor agency.” In contrast, “or its successor” is used in conjunction with the American Medical Association’s Committee on Allied Health Education and Accreditation in s. 448.05 (5) (a) 2., Stats. Also, it appears that the first comma should be replaced by the word “or” and the last comma should be deleted.

c. In s. Med 8.08 (2) (a), it appears that “in” has inadvertently been left out of the first sentence, following “described.”

d. There is nothing in the materials to indicate whether ss. 448.05 (5) (c) and 448.20 (3) (a) have been followed.